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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
RENO DIVISION**

TRINA GUNNARSON,	)	Case No: 3:19-cv-00020-MMD-WGC
	)	
Plaintiff	)	
	)	<b>STIPULATION FOR EXTENSION OF</b>
v.	)	<b>TIME TO FILE DEFENDANT'S CROSS</b>
	)	<b>MOTION TO AFFIRM</b>
ANDREW SAUL,	)	
Commissioner of Social Security,	)	<b>(Second Request)</b>
	)	
Defendant.	)	

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Defendant Andrew Saul, Commissioner of Social Security, hereby requests an extension of time of thirty days to Monday, September 23, 2019, to prepare and file his cross motion to affirm. This is the Commissioner's second request for an extension.

Upon review of the record and Plaintiff's MSJ, the undersigned believes that this case may warrant voluntary remand in lieu of further litigation. Therefore, the undersigned respectfully requests this additional time to attempt to obtain remand authority from the agency.

1 On August 22, 2019, Plaintiff's counsel informed Defendant by email that he had no  
2 objection to this extension.

3  
4 Respectfully submitted,

5 Date: August 23, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/\*Cyrus Safa

7 CYRUS SAFA

8 \*authorized by email August 22, 2019

9 Attorney for Plaintiff

10 Date: August 23, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

Social Security Administration

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19  
20 IT IS SO ORDERED.

21  
22 DATE: August 26, 2019.  
23 \_\_\_\_\_

William G. Cobb

24 HONORABLE WILLIAM G. COBB

25 United States Magistrate Judge